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Chapter 11 Trustee*

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION**

In re

LESLIE KLEIN,

Debtor.

Case No. 2:23-bk-10990-NB

Chapter 11

**NOTICE OF MOTION OF CHAPTER 11
TRUSTEE, FOR ORDER (A)
ENFORCING AUTOMATIC STAY, (B)
EXPUNGING LIS PENDENS RECORDED
AGAINST 322 N. JUNE STREET, LOS
ANGELES, CALIFORNIA FROM
PROPERTY RECORDS, (C) VOIDING
LIS PENDENS AB INITIO AND FINDING
IT HAVING NO FORCE OR EFFECT,
AND (D) AUTHORIZING TRUSTEE TO
RECORD AN ORDER GRANTING THE
MOTION FOR THE PURPOSE OF
CLEARING TITLE**

Date: October 7, 2025
Time: 2:00 p.m. PST
Location: U.S. Bankruptcy Court
Courtroom 1545
255 E. Temple St.
Los Angeles, CA 90012
Judge: Hon. Neil W. Bason

**TO THE HONORABLE NEIL W. BASON, UNITED STATES BANKRUPTCY JUDGE;
THE OFFICE OF THE UNITED STATES TRUSTEE; AND PARTIES ENTITLED TO
NOTICE HEREOF:**

PLEASE TAKE NOTICE that on September 19, 2025 Bradley D. Sharp, in his capacity
as Chapter 11 Trustee (the “**Trustee**”) of the bankruptcy estate (the “**Estate**”) of Leslie Klein, the

1 debtor herein (the “**Debtor**”), filed the *Motion For Order (A) Enforcing Automatic Stay, (B)*
2 *Expunging Lis Pendens Recorded Against 322 N. June Street, Los Angeles, California From*
3 *Property Records, (C) Voiding Lis Pendens Ab Initio And Finding It Having No Force Or Effect,*
4 *And (D) Authorizing Trustee To Record An Order Granting The Motion For The Purpose Of*
5 *Clearing Title* [Docket No. 1228] (the “**Motion**”) the Court for entry of an order (a) enforcing the
6 automatic stay; (b) expunging the notice of pendency of action, recorded in the Official Records of
7 Recorder’s Office, Los Angeles County as 20250105088 (the “**Lis Pendens**”), dated February 19,
8 2025, encumbering property of the Estate, *i.e.*, real property located at 322 N. June St., Los
9 Angeles, CA (the “**June St. Property**”); (c) voiding the Lis Pendens *ab initio* and finding it has no
10 force or effect; (d) authorizing the Trustee to record an order granting the Motion for the purpose
11 of clearing title of the June St. Property on account of the wrongful recordation of the Lis
12 Pendens; (e) authorizing further relief from the Court on an expedited basis if a title company
13 refuses to issue title insurance as a result of the Debtor’s actions against the June St. Property; and
14 (f) awarding sanctions in an amount to be determined at a future hearing upon separate motion to
15 be filed by the Trustee, in his discretion.

16 **PLEASE TAKE FURTHER NOTICE** that on September 19, 2025 the Court entered an
17 order [Docket No. 1230] (the “**OST**”) scheduling a hearing on the Motion for **October 7, 2025 at**
18 **2:00 p.m. Pacific Time**, or as soon thereafter as counsel may be heard before the Honorable Neil
19 W. Bason, United States Bankruptcy Judge, in Courtroom 1545, 255 East Temple Street, Los
20 Angeles, California 90012.

21 **PLEASE TAKE FURTHER NOTICE** that, pursuant to the OST, if you wish to oppose
22 the Motion, you must file a written response with the Court and serve a copy of it upon the
23 undersigned counsel no later than **September 26, 2025 at 3:00 p.m. Pacific Time** The failure to
24 properly file and serve an opposition may be deemed consent to the relief requested in the Motion
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1 or a waiver of any right to oppose the Motion. Any reply to oppositions or responses to the Motion
2 must filed and served **no later than October 3, 2025 at 12:00 p.m. Pacific Time.**

3 Dated: September 19, 2025

PACHULSKI STANG ZIEHL & JONES LLP

5 By /s/ Jeffrey W. Dulberg
6 Jeffrey W. Dulberg

7 *Counsel to Bradley D. Sharp,*
8 *Chapter 11 Trustee*